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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

PREMIER HOLDING
CORPORATION, RANDALL
LETCAVAGE, and JOSEPH
GREENBLATT,

Defendants.

Case No. 18:00813-(CJC)-(KES)

**NOTICE OF MOTION AND MOTION
BY PLAINTIFF SECURITIES AND
EXCHANGE COMMISSION FOR
REMEDIES TO BE IMPOSED ON
THE DEFENDANTS**

Date: January 25, 2021
Time: 1:30 p.m.
Courtroom: 9B
Judge: Hon. Cormac J. Carney

1 TO ALL DEFENDANTS:

2 PLEASE TAKE NOTICE that, on January 25, 2021, at 1:30 p.m., or such time
3 as the Court requires, Plaintiff Securities and Exchange Commission (“SEC”) will,
4 and hereby does, move for the Court to impose remedies and judgments against
5 Defendant Premier Holding Corp and Defendant Randall Letcavage, based on the
6 summary judgment decision entered against them on November 30, 2020 (Dkt. 208),
7 and Defendant Joseph Greenblatt, based on the summary judgment order entered
8 against him on December 10, 2019 (Dkt. 146).
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11 The hearing will take place in the Courtroom of the Honorable Cormac J.
12 Carney, Courtroom 9B **Ronald Reagan Federal Building and United States**
13 **Courthouse, 411 West Fourth Street, Courtroom 9 B, Santa Ana, CA, 92701-**
14 **4516 or at such place as the Court designates.** The SEC’s Motion for summary
15 judgment is based upon the accompanying Memorandum of Points and Authorities,
16 dated December 17, 2020; Declaration of Bennett Ellenbogen, dated December 17,
17 2020 with attached exhibits; the filings and records in this action; and any other
18 evidence or argument that the SEC may present in support of the Motion.
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22 Defendants are required to serve any opposing papers on the SEC by December
23 24, 2020. This Motion is made pursuant to the Court’s directive in its order granting
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1 Summary Judgment on November 30, 2020 and its subsequent minute order dated
2 December 7, 2020 (Dkt. 212).

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4 Dated: December 17, 2020

/s/ Bennett Ellenbogen

Bennett Ellenbogen

Alexander Vasilescu

Amy Longo

Attorneys for Plaintiff

Securities and Exchange Commission

PROOF OF SERVICE

I am over the age of 18 years and not a party to this action. My business address is:

U.S. SECURITIES AND EXCHANGE COMMISSION,
444 S. Flower Street, Suite 900, Los Angeles, California 90071
Telephone No. (212) 336-0062; Facsimile No. (213) 443-1904.

On December 17, 2020, I caused to be served the documents entitled **NOTICE OF MOTION AND MOTION BY PLAINTIFF SECURITIES AND EXCHANGE COMMISSION FOR REMEDIES AGAINST DEFENDANTS, AND MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF ITS MOTION FOR REMEDIES AGAINST THE DEFENDANTS** on all the parties to this action addressed as stated on the attached service list:

☐ **OFFICE MAIL:** By placing in sealed envelope(s), which I placed for collection and mailing today following ordinary business practices. I am readily familiar with this agency's practice for collection and processing of correspondence for mailing; such correspondence would be deposited with the U.S. Postal Service on the same day in the ordinary course of business.

☐ **PERSONAL DEPOSIT IN MAIL:** By placing in sealed envelope(s), which I personally deposited with the U.S. Postal Service. Each such envelope was deposited with the U.S. Postal Service at Los Angeles, California, with first class postage thereon fully prepaid.

☐ **EXPRESS U.S. MAIL:** Each such envelope was deposited in a facility regularly maintained at the U.S. Postal Service for receipt of Express Mail at Los Angeles, California, with Express Mail postage paid.

☐ **HAND DELIVERY:** I caused to be hand delivered each such envelope to the office of the addressee as stated on the attached service list.

☐ **UNITED PARCEL SERVICE:** By placing in sealed envelope(s) designated by United Parcel Service ("UPS") with delivery fees paid or provided for, which I deposited in a facility regularly maintained by UPS or delivered to a UPS courier, at Los Angeles, California.

☒ **ELECTRONIC MAIL:** By transmitting the document by electronic mail to the electronic mail address as stated on the attached service list.

☒ **E-FILING:** By causing the document to be electronically filed via the Court's CM/ECF system, which effects electronic service on counsel who are registered with the CM/ECF system.

☐ **FAX:** By transmitting the document by facsimile transmission. The transmission was reported as complete and without error.

I declare under penalty of perjury that the foregoing is true and correct.

Date: December 17, 2020

S/
Bennett Ellenbogen

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